

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND

In re:

THE ROMAN CATHOLIC ARCHBISHOP  
OF BALTIMORE,

Debtor.

Case No. 23-16969-MMH

Chapter 11

Judge Michelle M. Harner

**DECLARATION OF ANDREW J. GLASNOVICH IN SUPPORT OF MOTION OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR DERIVATIVE  
STANDING TO COMMENCE, PROSECUTE, AND SETTLE CAUSES OF ACTION  
ON BEHALF OF THE DEBTOR'S BANKRUPTCY ESTATE**

I, Andrew J. Glasnovich, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am a partner of the firm of Stinson LLP ("Stinson"), a law firm with offices at 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402.
2. On November 28, 2023 the Cour entered the *Order Approving the Employment of Stinson LLP as Legal Counsel for the Official Committee of Unsecured Creditors Effective as of October 25, 2023*. [Dkt. No. 217].
3. On November 29, 2023, the Court entered the *Order Authorizing the Employment of Tydings & Rosenberg LLP as Counsel for the Official Committee of Unsecured Creditors*. [Dkt. No. 220].
4. On June 30, 2025, Stinson sent a letter to Debtor's counsel asking for lists of all the prepetition transfers the Debtor considered plausibly avoidable under the Bankruptcy Code and all the avoidance actions the Debtor planned to pursue. A true and correct copy of that letter is attached as Exhibit 1.
5. On July 1, 2025, Debtor's counsel responded writing that the Debtor did not believe any transfers were fraudulent and requesting that the Committee identify fraudulent transfers so

Executed this 18th day of August, 2025, at Minneapolis, Minnesota.

Dated: August 18, 2025

/s/ Andrew J. Glasnovich

Andrew J. Glasnovich

**EXHIBIT 1**

STINSON

Edwin Caldie

PARTNER

DIRECT: 612.335.1404

OFFICE: 612.335.1500

ed.caldie@stinson.com

June 30, 2025

**BY EMAIL**

Blake D. Roth (blake.roth@hkllaw.com)  
Holland & Knight LLP  
511 Union Street, Suite 2700  
Nashville, Tennessee 12207

**Re: *In re The Roman Catholic Archbishop of Baltimore, Maryland* (Case No. 23-16969)**

Blake:

I write to request the production of certain documents and information pertaining to avoidance actions in the Archdiocese's chapter 11 case.

As you are aware, the deadline for commencing any action or proceeding under section 544, 545, 547, or 548 of Title 11 of the United States Code is September 29, 2025. In an effort to prepare for that deadline, the Committee respectfully requests the following:

- a list of all the transfers the Debtor has considered, analyzed, evaluated, or assessed for recovery under section(s) 544, 545, 547, and/or 548 of Title 11 of the United States Code;
- a list of all the transfers the Debtor considers to be plausibly avoidable under one or more of these sections;
- a list of all the avoidance actions the Debtor plans to commence prior to the deadline to recover those transfers for the benefit of the estate; and
- any and all documents reviewed by you in the course of compiling each of the above lists.

Please provide these documents and information at your earliest convenience, but not later than 21 days from the date of this letter. If you have already provided these documents, please provide us with the corresponding Bates numbers responsive to each request. We are available to discuss at your convenience.

Sincerely,

/s/ Edwin H. Caldie

Edwin Caldie  
Stinson LLP

50 South Sixth Street, Suite 2600, Minneapolis, MN 55402

STINSON LLP \ STINSON.COM

**EXHIBIT 2**

---

**From:** Blake.Roth@hklaw.com  
**Sent:** Tuesday, July 1, 2025 10:24 AM  
**To:** Glasnovich, Drew J.  
**Cc:** Caldie, Ed; Khalouian, Nicole; Blake.Roth@hklaw.com  
**Subject:** RE: RCAB: Avoidance Actions

**External Email – Use Caution**

Drew,

Good morning. I have conferred regarding your letter regarding avoidance actions. We reviewed long ago large transfers from the RCAB and did not believe any were fraudulent transfers. You, however, have the debtor's accounting system. To the extent you have identified any transfers the Committee believes constitute fraudulent transfers, please identify them and we'll evaluate. Many thanks in advance.

**Blake Roth | Holland & Knight**

Partner  
Holland & Knight LLP  
511 Union Street, Suite 2700 | Nashville, Tennessee 37219  
Phone 615.850.8749 | Fax 615.244.6804  
blake.roth@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

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**From:** Glasnovich, Drew J. <drew.glasnovich@stinson.com>  
**Sent:** Monday, June 30, 2025 4:35 PM  
**To:** Roth, Blake (NSH - X68749) <Blake.Roth@hklaw.com>  
**Cc:** Caldie, Ed <ed.caldie@stinson.com>; Khalouian, Nicole <nicole.khalouian@stinson.com>  
**Subject:** RCAB: Avoidance Actions

*[External email]*

Blake,

Attached please find the Committee's request regarding the Debtor's avoidance action analysis.

Please let me know if you have any questions. We look forward to your response.

Best,

Drew  
**Drew J. Glasnovich**  
Partner  
Pronouns: He/Him

STINSON LLP

50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Direct: 612.335.1426 \ [Bio](#)

Assistant: [MPL.LSSTeam5@stinson.com](mailto:MPL.LSSTeam5@stinson.com) \ 612.335.1814

**STINSON.COM**

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**EXHIBIT 3**



STINSON

Edwin Caldie

PARTNER

DIRECT: 612.335.1404

OFFICE: 612.335.1500

ed.caldie@stinson.com

July 15, 2025

**BY EMAIL**

Blake D. Roth (blake.roth@hklaw.com)  
Holland & Knight LLP  
511 Union Street, Suite 2700  
Nashville, Tennessee 12207

**Re: *In re The Roman Catholic Archbishop of Baltimore, Maryland* (Case No. 23-16969)**

Blake:

Thank you for your message of July 1, 2025. In the course of reviewing materials provided by the Debtor, we have identified several pre-petition transfers that the Committee believes are avoidable and recoverable by the Debtor for the benefit of its estate and creditors.

Attached as **Appendix 1** is a list of the Debtor's affiliates who received transfers in the four years prior to the petition date. We understand that the Debtor has agreed to obtain tolling agreements from these affiliated entities. Please confirm that each of these entities will agree to execute a tolling agreement through September 29, 2026.

In addition, attached as **Appendix 2** is a list of the payees and total disbursements made to each between the period of June 30, 2023 and September 29, 2023. The Committee has reviewed the information provided by the Debtor and has reason to believe that the transfer of these amounts to these payees may be avoidable under one or more of 11 U.S.C. §§ 544, 547, and 548 and recoverable for the benefit of the estate under 11 U.S.C. § 550.

To maximize recoveries for unsecured creditors, the Committee requests that the Debtor pursue avoidance actions against these payees for these amounts. Please indicate: (i) which (if any) of the amounts listed in Appendix 2 correspond to transfers that the Debtor will seek to avoid and recover for the benefit of the estate, and (ii) for those the Debtor will not seek to avoid and recover, please explain why not.

The Committee further requests that the Debtor assist in obtaining the consent of the parties identified on Appendix 2 to toll any applicable statute of limitations related to the transactions identified therein though and including September 29, 2025.

50 South Sixth Street, Suite 2600, Minneapolis, MN 55402

STINSON LLP \ STINSON.COM

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We'd appreciate your response on or before July 21, 2025. We are available to discuss if helpful.

Sincerely,

/s/ Edwin H. Caldie

Edwin Caldie  
**Stinson LLP**

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**APPENDIX 1**  
**CATHOLIC AFFILIATE TRANSFEREES**

1. ACC Administration
2. Archbishop's Lenten Appeal
3. Archbishops Residence
4. Associated Catholic Charities, Inc.
5. Basilica Trust Inc.
6. Cathedral Foundation, The
7. Cathedral Parish of
8. Catholic Cemeteries of Archdiocese of
9. Catholic Charities
10. Catholic Community Foundation
11. Catholic Community School
12. Catholic Review
13. Cherry Hill Town Center
14. Christ the King Church
15. Christopher's Place Employment
16. Cristo Rey
17. Esperaza Center
18. Fed of Diocesan Liturgical
19. Franciscan Center
20. Franciscan Friars
21. Franciscan Srs of Baltimore
22. Gallagher Family Fund
23. General Insurance PCS 2020-01
24. Heritage of Hope
25. Holy Cross Cemetery
26. Holy Rosary Cemetery
27. Human Development
28. Inter Parish Loan Fund, Inc.
29. John Carroll Foundation
30. League of the Little Flower
31. Marianist Society, Inc.
32. Maryland Catholic Conference
33. Mother Mary Lange Guild
34. Mount Calvary Parish
35. Msgr. O'Dwyer Retreat House
36. Mt St. Mary's Seminary
37. Mt. Calvary Church
38. My Sister's Place
39. National Black Catholic Conf

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40. National Black Catholic Congr
41. New Cathedral Cemetary
42. Oblate Sisters of Providence
43. O'Dwyer House
44. Our Daily Bread
45. Our Lady of Lourdes Church
46. Retirement Plan for Lay Employees
47. Roman Catholic Foundation
48. Sacred Heart of Jesus Parish
49. Sacred Heart of Mary Cemetery
50. Sacred Heart Parish
51. Sarah's House
52. Sisters of Notre Dame de Namur
53. Society of Jesus, Mary
54. Sr Holy Name of Jesus and Mary
55. SS James & John Elementary Sch
56. SS Mathew & Thomas More Rel Ed
57. SSND Villa Assumpta
58. St Anthony/Most Precious Blood
59. St Camillus Church
60. St Elizabeth
61. St Francis of Assisi Athletic Assoc
62. St Francis of Assisi Church
63. St Francis of Assisi Mission
64. St Francis Xavier Head Start
65. St Isaac Joques Catholic Church
66. St James Catholic Church
67. St Joachim House
68. St John Cemetery, Inc
69. St Joseph Provincial House
70. St Leo's Church
71. St Luke's Place
72. St Mark's Apartment
73. St Mary's Church
74. St Mary's Seminary and Univ
75. St Peter Adult Learning Cntr
76. St Peter Claver Church
77. St Peter Parish
78. St Peters Cemetery
79. St Peter's Restoration Cemetery
80. St Sebastian's Church
81. St Thomas Episcopal Church
82. St Vincent de Paul Society

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83.	Stella Maris
84.	The Basilica of the Assumption
85.	The Catholic Review
86.	The Congregation of the Holy Spirit
87.	Villa Maria
88.	Village Crossroads Senior Housing
89.	Archbishop Curley High
90.	Archbishop Spalding High
91.	Bishop Walsh High School
92.	St Maria Goretti High
93.	St Mary's High School
94.	Calvert Hall College
95.	Catholic High School of Balt
96.	John Carroll High School
97.	Loyola Blakefield
98.	Maryvale Preparatory School
99.	Mercy High School
100.	Mother Seton Academy
101.	Mount de Sales Academy
102.	Mt St Joseph High School
103.	Notre Dame Prep School
104.	St Frances Academy
105.	St John's Catholic Prep
106.	Trinity School (Ilchester- Ellicott City)
107.	Annunciation (Rosedale)
108.	Basilica of the Assumption
109.	Blessed Sacrament
110.	Cath Comm of Ascension/StAugustine
111.	Cathedral of Mary Our Queen
112.	Catholic Community of South Baltimore Parish
113.	Christ the King
114.	Church of the Immaculate Conception
115.	Corpus Christi
116.	Divine Mercy Parish
117.	Holy Family (Davidsonville)
118.	Holy Family (Randallstown)
119.	Holy Family Parish
120.	Holy Korean Martyrs
121.	Holy Rosary
122.	Holy Spirit (Joppa)
123.	Immaculate Conception (Towson)
124.	Immaculate Heart of Mary



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125.	Most Precious Blood
126.	Nativity (Timonium)
127.	New All Saints
128.	Our Lady of Fatima
129.	Our Lady of Grace (Parkton)
130.	Our Lady of Hope (Dundalk)
131.	Our Lady of LaVang
132.	Our Lady of Mt Carmel
133.	Our Lady of Perpetual Help Parish
134.	Our Lady of Pompei
135.	Our Lady of Sorrows
136.	Our Lady of the Angels
137.	Our Lady of the Chesapeake
138.	Our Lady of the Fields
139.	Our Lady of the Mountains Parish
140.	Our Lady of Victory (Arbutus)
141.	Our Lady Queen of Peace
142.	Prince of Peace Church
143.	Resurrection (Ellicott City)
144.	Resurrection (Laurel)
145.	Sacred Heart (Glyndon)
146.	Sacred Heart of Jesus
147.	Sacred Heart of Mary (Dundalk)
148.	Shrine of St. Anthony
149.	Shrine of the Little Flower
150.	Shrine of the Sacred Heart
151.	SS Phillip & James
152.	St Agnes
153.	St Alphonsus
154.	St Ambrose
155.	St Andrew By-The-Bay
156.	St Ann
157.	St Ann (Hagerstown)
158.	St Anthony of Padua
159.	St Anthony Shrine (Emmitsburg)
160.	St Athanasius
161.	St Augustine (Williamsport)
162.	St Bartholomew
163.	St Benedict Church
164.	St Bernadette (Severn)
165.	St Bernardine
166.	St Casimir
167.	St Cecilia Church

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168.	St Charles Borromeo
169.	St Clare (Essex)
170.	St Clement (Lansdowne)
171.	St Clement (Rosedale)
172.	St Dominic
173.	St Edward
174.	St Elizabeth Ann Seton
175.	St Francis de Sales (Abingdon)
176.	St Francis of Assisi
177.	St Francis of Assisi (Fulton)
178.	St Francis Xavier
179.	St Francis Xavier (HuntValley)
180.	St Gabriel
181.	St Gabriel (Woodlawn)
182.	St Gregory the Great
183.	St Ignatius
184.	St Ignatius (Hickory)
185.	St Ignatius Loyola (Frederick)
186.	St Isaac Jogues
187.	St James (Boonsboro)
188.	St Jane Frances (Pasadena)
189.	St Joan of Arc (Aberdeen)
190.	St John (Columbia)
191.	St John Long Green Valley
192.	St John Neumann
193.	St John Parish (Westminster)
194.	St John the Evangelist
195.	St John the Evangelist (Frederick)
196.	St John the Evangelist (Severna Park)
197.	St Joseph (Eldersburg)
198.	St Joseph (Emmitsburg)
199.	St Joseph (Fullerton)
200.	St Joseph (Hagerstown)
201.	St Joseph (Midland)
202.	St Joseph (Odenton)
203.	St Joseph (Taneytown)
204.	St Joseph Buckeystown
205.	St Joseph Parish (Cockeysville)
206.	St Joseph Passionist Monastery
207.	St Jude Shrine
208.	St Katharine Drexel
209.	St Lawrence Martyr
210.	St Leo

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211.	St Louis Church
212.	St Luke (Sparrows Point)
213.	St Margaret (Bel Air)
214.	St Mark (Catonsville)
215.	St Mark Parish (Fallston)
216.	St Mary (Annapolis)
217.	St Mary (Govans)
218.	St Mary (Hagerstown)
219.	St Mary (Pylesville)
220.	St Mary of the Annunciation
221.	St Mary's, Annapolis
222.	St Matthew Parish
223.	St Michael (Mt Airy)
224.	St Michael (Overlea)
225.	St Michael (Williamsport)
226.	St Patrick
227.	St Patrick (Havre de Grace)
228.	St Paul (Ellicott City)
229.	St Peter
230.	St Peter Claver
231.	St Peter Hancock
232.	St Peter Parish (Libertytown)
233.	St Peter the Apostle
234.	St Peter the Apostle (Oakland)
235.	St Philip Neri (Linthicum)
236.	St Pius V
237.	St Pius X
238.	St Rita (Dundalk)
239.	St Rose of Lima
240.	St Stephen (Bradshaw)
241.	St Thomas Aquinas
242.	St Thomas More
243.	St Timothy (Walkersville)
244.	St Timothy RC Congregation, Inc
245.	St Ursula
246.	St Veronica
247.	St Vincent DePaul Parish
248.	St Wenceslaus
249.	St William of York
250.	Transfiguration Catholic Community
251.	Tri-Parish Catholic Community
252.	Ascension (Halethorpe)
253.	Church of the Holy Apostles



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254.	Crucifixion (Glen Burnie)
255.	Good Shepherd (Glen Burnie)
256.	Holy Redeemer Chapel
257.	Immaculate Conception
258.	Our Lady of Good Counsel
259.	Queen of Peace (James & John)
260.	SS Peter & Paul (Cumberland)
261.	St Ambrose (Cresaptown)
262.	St Ann (Grantville)
263.	St Brigid Church
264.	St Elizabeth of Hungary
265.	St Gabriel (Barton)
266.	St Jane Frances School
267.	St Jerome
268.	St Martin
269.	St Mary Star of the Sea
270.	St Michael Church
271.	St Patrick (Cumberland)
272.	St Patrick (Mt Savage)
273.	St Peter (Westernport)
274.	St Stanislaus Kostka
275.	Archbishop Borders School
276.	Ascension School
277.	Bishop John Neumann Campus
278.	Cardinal Shehan School
279.	Catholic Community of South Baltimore
280.	Ecumenical Institute
281.	Fr Charles Hall Elementary
282.	Fr Charles Hall Middle
283.	Fr Kolbe School
284.	Immaculate Conception School
285.	Immaculate Heart of Mary
286.	Institute of Notre Dame
287.	Jemicy School
288.	Monsignor Slade Catholic School
289.	Mother Mary Lange Catholic School
290.	Mother Seton School
291.	Mount St. Mary's College
292.	Mt De Sales Academy
293.	Neumann,Bishop John Campus
294.	Order of the Pious School
295.	Our Lady of Fatima School
296.	Our Lady of Grace School

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297.	Our Lady of Hope/St. Luke School
298.	Our Lady of Mount Carmel High
299.	Our Lady of Mt Carmel Elementary
300.	Our Lady of Perpetual Help
301.	Our Lady of the Rosary
302.	Resurrection/St. Paul School
303.	Sacred Heart School, Glyndon
304.	School of the Cathedral of Mary Our Queen
305.	School of the Incarnation
306.	School Sisters of Notre Dame
307.	Sisters of St. Joseph Guild
308.	St Agnes School
309.	St Alphonsus/Basilica School
310.	St Ambrose Catholic School
311.	St Augustine Catholic School
312.	St Bernardine School
313.	St Casimir School
314.	St Clare School
315.	St Elizabeth Habilitation Schl
316.	St Francis of Assisi School
317.	St Joan of Arc School
318.	St John Neumann, Cumberland
319.	St John Regional (Frederick)
320.	St John School (Westminster)
321.	St John the Evangelist Sch(Severna)
322.	St John the Evangelist School (Hydes)
323.	St Joseph Catholic School
324.	St Joseph School (Fullerton)
325.	St Louis School
326.	St Margaret School (Bel Air)
327.	St Mark School (Catonsville)
328.	St Mary of the Assumption Sch
329.	St Mary School (Hagerstown)
330.	St Mary's Elementary School
331.	St Michaels School, Frostburg
332.	St Michael-St. Clement
333.	St Peter (Westernport)
334.	St Philip Neri School (Linthi)
335.	St Rose of Lima School
336.	St Stephen (Bradshaw)
337.	St Ursula School
338.	St Vincent's Villa

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339.	St William of York School
340.	Towson Catholic High
341.	Trinity School
342.	Villa Maria School
343.	Cardinal Gibbons High
344.	Cardinal Gibbons Middle School
345.	Holy Angels School
346.	Holy Family (Randallstown)
347.	Holy Spirit School
348.	John Paul Regional Academy
349.	New All Saints Parish School
350.	Our Lady of Victory
351.	Our Lady Queen of Peace School
352.	Queen of Peace (St Katharine)
353.	Sacred Heart of Mary School
354.	Sacred Heart School, Dundalk
355.	Seton Keough High
356.	Shrine of the Sacred Heart
357.	St Anthony School
358.	St Clement Mary Hofbauer School
359.	St Dominic School
360.	St Elizabeth Hungary School
361.	St James & John School
362.	St Katharine School
363.	St Pius X
364.	St Rita School
365.	St Thomas Aquinas School
366.	Visitation Academy

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**APPENDIX 2**  
**THE ROMAN CATHOLIC ARCHBISHOP OF BALTIMORE**  
**DISBURSEMENTS DURING THE PERIOD JUNE 30, 2023 AND SEPTEMBER 29, 2023**

<b>PAYEE</b>	<b>TOTAL AMOUNT DISBURSED (USD)</b>
CIGNA HEALTHCARE	11,836,335.03
TRUST INSURANCE PCS	8,200,550.00
HEFFERNAN TRUST LEUMI USA	6,073,978.56
T ROWE PRICE	1,377,117.38
LIFE INSURANCE COMPANY OF NORTH AMERICA	591,378.46
PNC CAPITAL MARKETS	555,863.72
GALLAGHER EVELIUS & JONES	480,000.00
SISCO, INC.	451,942.89
MT ST MARYS' UNIVERSITY - MD	399,710.57
HOLLAND & KNIGHT LLP	354,923.98
MERCY RIDGE	312,517.30
AMERICAN EXPRESS	276,359.26
AYERS SAINT GROSS	255,009.55
ULTIMATE SOFTWARE GROUP, INC.	251,227.05
USCCB-CHURCH IN CENTRAL & EASTERN EUROPE	184,747.25
OFFICE OF NATIONAL COLLECTIONS	170,500.00
MARYLAND CATHOLIC CONFERENCE	166,554.00
POWERSCHOOL, INC.	137,908.30
GRANT THORTON LLP	136,102.50
REGIONAL COMMISSARIAT OF THE HOLY LAND	131,413.82
THE CATHOLIC UNIVERSITY OF AMERICA	121,530.00
ST. MARY'S SEMINARY & UNIV	106,315.08
BLACKBAUD SYSTEMS	103,215.37
AON CONSULTING, INC	99,094.36
POTTS & CALLAHAN, INC.	87,260.00
BALTIMORE MARRIOTT INNER HARBOR-CAMDEN YARDS	85,154.85
BLANK ROME LLP	74,897.76
ADVANCED ENTERPRISE TECHNOLOGIES	72,345.00
PRINT SHOP THE	71,361.09
PNC BANK NATIONAL ASSOCIATION	59,837.73
DOMINICAN FRIARS	58,343.31
ROEBUCK & SON INC	52,234.65

**EXHIBIT 4**



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**From:** Blake.Roth@hklaw.com  
**Sent:** Friday, July 25, 2025 1:51 PM  
**To:** Glasnovich, Drew J.  
**Cc:** Caldie, Ed; Khalouian, Nicole; Blake.Roth@hklaw.com; Scott.Kunde@hklaw.com  
**Subject:** RE: RCAB: Avoidance Actions

**External Email – Use Caution**

Drew,

Good afternoon and happy Friday. With respect to the tolling, I refer you to my original response. If there are specific transfers for which you believe we should request tolling of the applicable statute of limitations, please let us know. Before you start to expend fees that may not be justified, we note the following:

- a) the entities identified on **Appendix 1** are non-profit charitable institutions entitled to charitable immunity with respect to any tort claims under state law, and section 548(a)(2) of the Bankruptcy Code expressly excludes charitable contributions to qualified religious or charitable entities or organizations in which: (a) the amount of the contribution does not exceed 15% of the gross annual income of the debtor for the year in which the transfer was made; or (b) if the contribution exceeds the 15% amount, the contribution was nevertheless consistent with the practices of the debtor in making charitable contributions (For the two years prior, gross annual income would have been in excess of \$100,000,000 each year); and
- b) we have included all assets of these entities in our analysis for settlement and, given the releases we will be seeking, will have to continue doing so, which makes this a silly exercise in our view.

With that said, if you have identified transfers you believe could be avoided notwithstanding charitable immunity's application or the limitation imposed on charitable contributions by section 548(a)(2) of the Bankruptcy Code, we are happy to discuss tolling with respect to those transfers. In the absence of identifying specific claims, it is difficult to request tolling—I have not heard of any entity agreeing to a general tolling of all claims, known and unknown. And, please note again that we believe the fees spent on this endeavor likely far outweigh any potential benefit.

With respect to the amounts you have identified for inquiry under section 547, below is a detailed response to each. Based upon our review, we do not believe any of these warrant pursuing. Like the above, we believe the fees spent / to be spent on pursuing any of the below far outweigh any potential benefit.

1. **Cigna Healthcare (\$11,836,335.03)**—These amounts represent daily health claims paid by the RCAB's insurance program. Accordingly, the transfers would have been made merely as a conduit and were not a transfer of the RCAB's property. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.
2. **Trust Insurance PCS (\$8,200,550)**—These amounts reflect premiums paid for sexual misconduct insurance obtained by/through the RCAB's insurance program. Accordingly, the transfers would have

been made merely as a conduit. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.

3. **Heffernan Trust Leumi USA (\$6,073,979)**—These amounts reflect insurance premiums paid for general risk policies obtained by/through the RCAB's insurance program. Accordingly, the transfers would have been made merely as a conduit. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.
4. **T. Rowe Price (\$1,377,117)**—These amounts were quarterly employer 403(b) remittances. Accordingly, the transfers would have been made merely as a conduit. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.
5. **Life Insurance Company of North America (\$591,378)**—These amounts relate to life insurance premiums paid by/through the RCAB's insurance program. Accordingly, the transfers would have been made merely as a conduit. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.
6. **PNC Capital Markets (\$555,864)**—These are payments to the RCAB's secured creditor and, therefore, are not preferences by definition.
7. **Gallagher Evelius & Jones (\$480,000)**—These amounts represent a combination of an advance retainer payment and payments made in amounts less than the retained maintained by Gallagher. Accordingly, Gallagher either received payments that were not on account of antecedent debt or was a secured creditor with respect to each payment made. Therefore, none of the transfers would constitute preferences by definition.
8. **Sisco, Inc. (\$451,943)**—These amounts represent worker compensation premiums paid by/through the RCAB's insurance program. . Accordingly, the transfers would have been made merely as a conduit. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.
9. **Holland & Knight LLP (\$354,924)**—All payments received by Holland & Knight were either advance retainer payments or payments made in amounts that did not exceed Holland & Knight's retainer. Accordingly, Holland & Knight either received payments that were not on account of antecedent debt or was a secured creditor with respect to each payment made. Therefore, none of the transfers would constitute preferences by definition.
10. **USCCS – Church in Central & Eastern Europe (\$184,747)**—This represents remittances of second collections. Accordingly, these would be restricted donations and transferred merely as a conduit.
11. **Office of National Collections (\$170,500)**— This represents remittances of second collections. Accordingly, these would be restricted donations and transferred merely as a conduit.
12. **Regional Commissariate of the Holy Land (\$131,414)**— This represents remittances of second collections. Accordingly, these would be restricted donations and transferred merely as a conduit.



13. **Ultimate Software Group, Inc. (\$251,227)**—These are payments made in exchange for a software license. These transfers were made in the ordinary course of business, we believe the transfers are made in advance of the license being granted, and we believe the recipient would have subsequent new value defenses.
14. **Powerschool, Inc. (\$137,908)**— These are payments made in exchange for a software license. These transfers were made in the ordinary course of business, we believe the transfers are made in advance of the license being granted, and we believe the recipient would have subsequent new value defenses.
15. **Blackbaud Systems (\$103,215)**—These amounts represent fees in connection with the operating system for receiving donations. These transfers would be made in the ordinary course of business and may also be secured by cash held by the recipient on account of the RCAB and other entities.
16. **American Express (\$276,359)**—These are credit card payments made in the ordinary course of business. While we have not undertaken an analysis, we also believe American Express would likely have substantial subsequent new value defenses.
17. **Ayers Saint Gross (\$355,010)**—These were payments made in connection with consulting services for Seek the City to Come. Any payments made would have been made in the ordinary course of business.
18. **Mercy Ridge (\$312,517)**—Payments to Mercy Ridge would constitute monthly retirement and assisting living payments (i.e., rent) and would have been made in the ordinary course of business.
19. **Grant Thornton (\$136,103)**—Grant Thornton provided audit services for the RCAB. Grant Thornton would have received an advance retainer payment and payments in amounts less than such retainer.
20. **Mt. St. Mary's University – MD (\$399,711)**—These amounts represent seminarian tuition and would either have been paid in advance or in the ordinary course of business.
21. **Aon Consulting (\$99,094)**—These are amounts paid for consulting services in connection with the lay and priest retirement plans. Accordingly, the transfers would have been made by/through the RCAB's insurance program such that the RCAB was merely as a conduit. In addition, to the extent that was not the case, these claims would certainly have fallen within the ordinary course of business defense to any claim under section 547 of the Bankruptcy Code.
22. **Potts & Callhan, Inc. (\$87,260.00)**—First, this is a transfer in the amount of \$43,630. A check for \$43,630 was issued and was intercepted and cashed by a fraudulent person. That check was pursued and recovered through insurance. A replacement check was issued in June 2023 to the vendor. Second, this was a payment made in connection with construction, meaning the recipient could have asserted a mechanic's lien had the payment not been made. This provides a complete defense.
23. **Baltimore Marriott Inner Harbor-Camden Yards (\$85,155)**—This is in connection with the Mid-Atlantic Conference in Baltimore. The RCAB acted as a pass through and forwarded custodial funds. Accordingly, this would not be a preference by definition.
24. **Blank Rome LLP (\$74,898)**— All payments received by Blank Rome were either advance retainer payments or payments made in amounts that did not exceed Blank Rome's retainer. Accordingly, Blank Rome either received payments that were not on account of antecedent debt or was a secured



creditor with respect to each payment made. Therefore, none of the transfers would constitute preferences by definition.

25. **Advanced Enterprise Technologies (\$72,345)**—These are payments made in exchange for a software license. These transfers were made in the ordinary course of business, we believe the transfers are made in advance of the license being granted, and we believe the recipient would have subsequent new value defenses.
26. **The Print Shop (\$71,361)**—These are payments made in the ordinary course for the RCAB's various departments.
27. **PNC Bank National Association (\$59,838)**—These are payments to the RCAB's secured lender and, therefore, do not constitute preferences by definition.
28. **Dominican Friars (\$58,343)**—These are payments for monthly labor provided by the Dominican Friars. These payments are made in the ordinary course of business.
29. **Roebuck & Son Inc. (\$52,235)**—These are printing costs associated with the Catholic Review Magazine and are made in the ordinary course of business.

If you have any other questions, please let us know.

Regards,

**Blake Roth | Holland & Knight**

Partner

Holland & Knight LLP

511 Union Street, Suite 2700 | Nashville, Tennessee 37219

Phone 615.850.8749 | Fax 615.244.6804

blake.roth@hklaw.com | www.hklaw.com

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-----Original Message-----

From: Glasnovich, Drew J. <drew.glasnovich@stinson.com>

Sent: Thursday, July 24, 2025 5:53 PM

To: Roth, Blake (NSH - X68749) <Blake.Roth@hklaw.com>

Cc: Caldie, Ed <ed.caldie@stinson.com>; Khalouian, Nicole <nicole.khalouian@stinson.com>

Subject: Re: RCAB: Avoidance Actions

[External email]

Blake,

We have not heard back from you on our request for (I) tolling agreements with the debtors Catholic affiliates and (II) confirmation the debtor will pursue the preferences we identified, or state the reasons why it has declined to pursue those transfers.

Please let me know the status of these requests.

Drew Glasnovich

On Jul 14, 2025, at 9:39 AM, Glasnovich, Drew J. <drew.glasnovich@stinson.com> wrote:

Blake,

Our goal right now is just to verify that the Debtor did an analysis of 547 claims and to confirm that the Debtor has decided not to pursue those. If and when the Committee decides to pursue recovery of these transfers, it will of course meet any obligation to verify applicable 547 defenses. We are not trying to instigate anything with this list. We understand that there may be viable defenses, especially on legal retainers. But that's not a per se defense though. We've seen in other cases where law firms sat on their retainers and accepted payment on 30/60 day terms and created problems. Any help you can provide in closing doors would help us narrow these issues.

We also understood that the Debtor wanted to avoid the cost associated with fighting on the transfers to Catholic affiliates, which is the basis for our request to toll. If you think it would be helpful for us to go line by line on the 2,000 plus transfers to these affiliates then we can do so, but that might eviscerate the cost savings we are aiming for.

Drew J. Glasnovich  
Partner  
Pronouns: He/Him

STINSON LLP  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402

Direct:  
612.335.1426 \ Bio<<https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.stinson.com%2Fpeople-AndrewJGlasnovich&data=05%7C02%7Cblake.roth%40hklaw.com%7C2c0fde90252b4611bb3408ddcb04cef7%7C032c460c093c408fbc92eceb0c22c8c4%7C1%7C0%7C638889943699940277%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOilwLjAuMDAwMCIslIAiOiJXaW4zMlslklFOljoitWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=k2KCCsu6M4bnRjoup1Mvi1zqSa7tYWxRFiaLxVO7B0Q%3D&reserved=0>>  
m%2Fpeople-AndrewJGlasnovich&data=05%7C02%7Cblake.roth%40hklaw.com%7C2c0fde90252b4611bb3408ddcb04cef7%7C032c460c093c408fbc92eceb0c22c8c4%7C1%7C0%7C638889943699940277%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOilwLjAuMDAwMCIslIAiOiJXaW4zMlslklFOljoitWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=k2KCCsu6M4bnRjoup1Mvi1zqSa7tYWxRFiaLxVO7B0Q%3D&reserved=0>

Assistant: MPL.LSSTeam5@stinson.com<<mailto:MPL.LSSTeam5@stinson.com>> \ 612.335.1814

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From: Blake.Roth@hklaw.com <Blake.Roth@hklaw.com>

Sent: Monday, July 14, 2025 8:55 AM  
To: Glasnovich, Drew J. <drew.glasnovich@stinson.com>  
Cc: Caldie, Ed <ed.caldie@stinson.com>; Khalouian, Nicole <nicole.khalouian@stinson.com>;  
Blake.Roth@hklaw.com  
Subject: RE: RCAB: Avoidance Actions

Drew,

We asked you to identify the transfers and basis for believing they should be avoided. A cursory review shows this was not done with respect to Appendix 1, which prevents us from responding to whether we believe any actions exist. With respect to Appendix 2, a cursory review shows a lack of any analysis whatsoever as required by section 547 (assuming you are asserting these are avoidable as preferential transfers). More specifically, a cursory review shows you included Holland & Knight and Blank Rome, each of which you know maintained retainers, making any payments fall outside of section 547. We are happy to engage in this process; however, we ask that you engage in the analysis if you want us to do the same.

Blake Roth | Holland & Knight  
Partner  
Holland & Knight LLP  
511 Union Street, Suite 2700 | Nashville, Tennessee 37219 Phone 615.850.8749 | Fax 615.244.6804  
blake.roth@hklaw.com<mailto:blake.roth@hklaw.com> | www.hklaw.com<http://www.hklaw.com/>

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From: Glasnovich, Drew J. <drew.glasnovich@stinson.com<mailto:drew.glasnovich@stinson.com>>  
Sent: Monday, July 14, 2025 8:49 AM  
To: Roth, Blake (NSH - X68749) <Blake.Roth@hklaw.com<mailto:Blake.Roth@hklaw.com>>  
Cc: Caldie, Ed <ed.caldie@stinson.com<mailto:ed.caldie@stinson.com>>; Khalouian, Nicole <nicole.khalouian@stinson.com<mailto:nicole.khalouian@stinson.com>>  
Subject: RE: RCAB: Avoidance Actions  
[External email]  
Blake,

Good morning. Please see our follow up letter on the avoidance actions. Let me know if you have any questions or would like to discuss further.

Best,

Drew

Drew J. Glasnovich  
Partner  
Pronouns: He/Him



STINSON LLP

50 South Sixth Street, Suite 2600

Minneapolis, MN 55402

Direct:

612.335.1426 \ Bio<<https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.stinson.com%2Fpeople->

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Assistant: MPL.LSSTeam5@stinson.com<mailto:MPL.LSSTeam5@stinson.com> \ 612.335.1814

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From: Blake.Roth@hklaw.com<mailto:Blake.Roth@hklaw.com>

<Blake.Roth@hklaw.com<mailto:Blake.Roth@hklaw.com>>

Sent: Tuesday, July 1, 2025 10:24 AM

To: Glasnovich, Drew J. <drew.glasnovich@stinson.com<mailto:drew.glasnovich@stinson.com>>

Cc: Caldie, Ed <ed.caldie@stinson.com<mailto:ed.caldie@stinson.com>>; Khalouian, Nicole

<nicole.khalouian@stinson.com<mailto:nicole.khalouian@stinson.com>>;

Blake.Roth@hklaw.com<mailto:Blake.Roth@hklaw.com>

Subject: RE: RCAB: Avoidance Actions

External Email – Use Caution

Drew,

Good morning. I have conferred regarding your letter regarding avoidance actions. We reviewed long ago large transfers from the RCAB and did not believe any were fraudulent transfers. You, however, have the debtor's accounting system. To the extent you have identified any transfers the Committee believes constitute fraudulent transfers, please identify them and we'll evaluate. Many thanks in advance.

Blake Roth | Holland & Knight

Partner

Holland & Knight LLP

511 Union Street, Suite 2700 | Nashville, Tennessee 37219 Phone 615.850.8749 | Fax 615.244.6804

blake.roth@hklaw.com<mailto:blake.roth@hklaw.com> | [www.hklaw.com](http://www.hklaw.com)<<http://www.hklaw.com/>>

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From: Glasnovich, Drew J. <drew.glasnovich@stinson.com<mailto:drew.glasnovich@stinson.com>>

Sent: Monday, June 30, 2025 4:35 PM

To: Roth, Blake (NSH - X68749) <Blake.Roth@hklaw.com<mailto:Blake.Roth@hklaw.com>>

Cc: Caldie, Ed <ed.caldie@stinson.com<mailto:ed.caldie@stinson.com>>; Khalouian, Nicole

<nicole.khalouian@stinson.com<mailto:nicole.khalouian@stinson.com>>

Subject: RCAB: Avoidance Actions

[External email]

Blake,

Attached please find the Committee's request regarding the Debtor's avoidance action analysis.

Please let me know if you have any questions. We look forward to your response.

Best,

Drew

Drew J. Glasnovich

Partner

Pronouns: He/Him

STINSON LLP

50 South Sixth Street, Suite 2600

Minneapolis, MN 55402

Direct:

612.335.1426 \ Bio<<https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.stinson.com%2Fpeople->

AndrewJGlasnovich&data=05%7C02%7Cblake.roth%40hklaw.com%7C2c0fde90252b4611bb3408ddcb04cef7%7C032c460c093c408fbc92eceb0c22c8c4%7C1%7C0%7C638889943700008838%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOilwLjAuMDAwMCIsIlAiOiJXaW4zMilskFOLjoiTWfPbClldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=CvIAV1GrMGcTs5L8BJMzrKKLAaLWWILYbcO%2BIPemJtQ%3D&reserved=0>

Assistant: MPL.LSSTeam5@stinson.com<<mailto:MPL.LSSTeam5@stinson.com>> \ 612.335.1814

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**EXHIBIT 5**



STINSON

Andrew J. Glasnovich

PARTNER

DIRECT: 612.335.1426

OFFICE: 612.335.1500

Drew.glasnovich@stinson.com

August 8, 2025

**BY EMAIL**

Blake D. Roth (blake.roth@hklaw.com)  
Holland & Knight LLP  
511 Union Street, Suite 2700  
Nashville, Tennessee 12207

**Re: *In re The Roman Catholic Archbishop of Baltimore, Maryland* (Case No. 23-16969)**

Blake:

We received your response to our July 15, 2025 letter, where the Committee requested information on potential preferential transfers and requested that the Debtor and its affiliates toll the time to act on avoidance of potential fraudulent transfers.

As to the actions we requested the Debtor pursue under 11 U.S.C. § 547, having reviewed your responses and the records available to the Committee, we largely agree that there are defenses to these actions and they cannot be pursued pursuant to 11 U.S.C. § 547(b). However, the Committee disagrees with the Debtor that the transfers on **Exhibit 1** to this letter have meritorious defenses. Accordingly, the Committee demands that the Debtor file adversary complaints on or before August 15, 2025, to avoid those transfers. If the Debtor does not initiate an action on each of those transfers, the Committee will seek derivative standing to do so on behalf of the Debtor's estate.

As to the Committee's request for tolling, it is regrettable that we could not find an agreement on this matter. As you will see from the attached **Exhibit 2**, there are a thousands of transfers the Committee believes were made by the Debtor either (i) gratuitously and with receiving any value and/or (ii) where the Debtor received far less value than the amount it transferred. These transfers were made during a time when the Debtor was paying Survivor claims and/or faced imminent liability under the CVA and its predecessors. Accordingly, the Committee demands that the Debtor, on or before August 15, 2025, provide a meritorious explanation for why the Debtor refuses to pursue each transfer. If the Debtor lacks a meritorious reason, the Committee demands the Debtor immediately file adversary complaints to avoid those transfers. If the Debtor does not initiate an action on each of those transfers on or before August 15, 2025, the Committee will seek derivative standing to do so on behalf of the Debtor's estate.

I understand through our communications that the Debtor will assert certain categorical defenses to these avoidance actions. The Committee requires that you provide more support for these categorical defenses. For example, you have stated that the Debtor is a natural person and therefore its transfers are exempt from avoidance under 11 U.S.C. § 548(a)(2). As you know, this exemption applies only to transfers made by natural persons and the Debtor is a corporation sole. If you have support for the proposition that the Debtor is a natural person please provide such legal and factual authority with your response. Please also explain why the Debtor failed to file its petition as an individual debtor, and instead marked on its petition,

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STINSON LLP \ STINSON.COM

CORE/3529758.0002/230709723.1

August 8, 2025

Page 2

Dkt. 1 at Q.6, that it is a corporation. Also, we understand that you will claim all of the transferees are entitled to charitable immunity. Please include in your response any analysis that you conducted on how a Maryland affirmative defenses preempts a federal statutory cause of action. Please also include your citation for the assertion that statutory causes of action created by Md. Com. Law Code Ann. §§ 15-201—214 are tort claims for which an entity is entitled to charitable immunity. *Montrose Christian Sch. Corp. v. Walsh*, 363 Md. 565, 582 (2001) (“Under Maryland law, charitable immunity is premised on the trust fund theory, that is, because funds of the organization are impressed with a trust for charitable purposes, those funds should not be diverted to pay tort damage awards.”).

We look forward to your prompt response.

Sincerely,

/s/ Andrew J. Glasnovich

Andrew Glasnovich  
**Stinson LLP**



August 8, 2025  
Page 3

**Exhibit 1**

**THE ROMAN CATHOLIC ARCHBISHOP OF BALTIMORE  
DISBURSEMENTS DURING THE PERIOD JUNE 30, 2023 AND SEPTEMBER 29, 2023**

<b>PAYEE</b>	<b>TOTAL AMOUNT DISBURSED (USD)</b>	<b>UCC Response</b>
AYERS SAINT GROSS	255,009.55	There is in sufficient transaction history to show this is ordinary. Seek the City to Come is an extraordinary action.
USCCB-CHURCH IN CENTRAL & EASTERN EUROPE	184,747.25	Debtor produced no evidence that it did not hold equitable title to these funds
OFFICE OF NATIONAL COLLECTIONS	170,500.00	Debtor produced no evidence that it did not hold equitable title to these funds
MARYLAND CATHOLIC CONFERENCE	166,554.00	No defense provided by Debtor
REGIONAL COMMISSARIAT OF THE HOLY LAND	131,413.82	Debtor produced no evidence that it did not hold equitable title to these funds
THE CATHOLIC UNIVERSITY OF AMERICA	121,530.00	No defense provided by Debtor
ST. MARY'S SEMINARY & UNIV	106,315.08	No defense provided by Debtor

August 8, 2025  
Page 4

**Exhibit 2**  
**THE ROMAN CATHOLIC ARCHBISHOP OF BALTIMORE**  
**DISBURSEMENTS FROM SEPTEMBER 29, 2019 AND SEPTEMBER 29, 2023**

**(ATTACHED AS SEPARATE PDF FILE)**